



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

November 19, 2013

Mr. William R. Henderson  
District Planning and Environmental Manager  
Florida Department of Transportation  
1109 South Marion Avenue  
Lake City, Florida 32025-5874

SUBJECT: Final Environmental Impact Statement for the U.S. 301 (State Road 200)  
Project from CR 277 to CR 233 in Bradford County, Florida  
CEQ No. 20130286

Dear Mr. Henderson:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Florida Department of Transportation (FDOT) and the Federal Highway Administration (FHWA) propose to construct a roadway project to relieve congestion on the S.R. 200/U.S. 301 corridor within the City of Starke caused by heavy truck traffic volumes and to provide additional capacity for future traffic growth. The logical termini for the proposed project extend from north of C.R. 227 to C.R. 233 in Bradford County, Florida.

The proposed action includes construction of a new limited access four-lane bypass facility to the west of Starke. The total length of the proposed project is approximately 7.3 miles. The project will also include new bridge construction at Alligator Creek, C.R. 100A, the CSX railroad spur, C.R. 229, and Water Oak Creek. The proposed project is anticipated to include interchanges at S.R. 100 and S.R. 16. A total of three alternatives were considered, including two build alternatives (Urban and Rural) and a no build alternative. The Rural Alternative was determined to be the preferred alternative.

The primary concerns raised by EPA in its review of the Draft EIS were related to direct and indirect impacts to wetlands and impacts to water quality in streams and wetlands. The EPA was also concerned that the Draft EIS did not provide a full assessment and/or selection of the Rural Alternative as the least environmentally damaging practicable alternative (LEDPA), as required. In addition, the EPA provided comments on socioeconomic impacts, environmental justice, air quality, noise impacts and mitigation, contamination, and floodplains which occur in the project area as well as comments regarding cumulative impacts.

The EPA reviewed the FEIS and appreciates inclusion of further evaluation of the alternatives to determine and document the Rural Alternative as the LEDPA. A comparative analysis was provided in an evaluation matrix in the document. The evaluation matrix illustrates various parameters which were used to compare performance against meeting the purpose and need,

minimizing costs, and environmental impacts. The matrix provides a total points scoring for ranking various features relating to purpose and need, project cost, and environmental considerations. Although the scoring system is subjective with regard to magnitude and intensity of impacts, it provides a basis for demonstrating that the Rural Alternative has less impact on the socioeconomic resources and the physical environment (air quality, contaminated sites, utilities, noise) while the Urban Alternative has less impact on natural resources (wetlands, water quality). The EPA supports the Rural Alternative as the LEDPA, with the project designed to avoid and minimize adverse environmental consequences to the greatest extent practicable and with unavoidable adverse impacts to natural resources mitigated.

The Rural Alternative will impact approximately 81 acres of wetlands. The Final EIS includes information on FDOT's efforts to avoid and minimize wetland impacts for the Rural Alternative. As requested by EPA during its review of the Draft EIS, the report also includes additional information regarding bridges and culverts and how these will further minimize adverse wetland and floodplain impacts and support movement of wildlife. Some additional avoidance and minimization measures could include reducing median width near wetland and stream crossings from 64 feet to 46 feet, steeper side slopes near wetland areas, the use of retaining walls to reduce fill slopes near wetlands, and reducing the construction footprint around proposed interchanges by tightening the design or using compressed design configurations. The Final EIS only provides a conceptual mitigation plan. The Record of Decision (ROD) should include strict avoidance and minimization measures and mitigation commitments for wetlands. The ROD should also provide better clarification of stream impacts associated with Alligator Creek, Water Oak Creek, or Prevatt Creek and what measures, such as bridging streams in the project area, will be utilized to minimize direct stream impacts. In addition to wetlands, the ROD should also include avoidance, minimization, and mitigation measures for stream impacts.

The EPA appreciates the development of an Indirect and Cumulative Effects (ICE) analysis for the proposed project. The Rural Alternative is proposed to be a limited access bypass facility on new alignment to the west of the City of Starke. The surrounding area is predominantly undeveloped land which lends itself to induced growth and development. The ICE analysis states that, with the preferred alternative (Rural), a total of 400 acres may develop which would not develop under the Urban or No Build Alternative. Development will predominantly occur surrounding the proposed interchanges at S.R. 16, S.R. 100, and the northern connection with U.S. 301. The ICE report outlines the indirect and cumulative socioeconomic, environmental, recreational and cultural, and hazardous materials effects which may occur as a result of the project. Based upon its review of the FEIS and the ICE report, the EPA supports the Rural Alternative being designed as a limited access facility with no more than two interchanges to reduce the potential for urban sprawl in the rural areas. The EPA also recommends that FDOT work with local and regional planners in the development of compatible land use plans to avoid or minimize adverse secondary impacts to the human and natural environment.

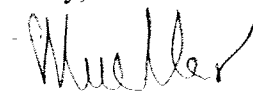
In accordance with Executive Order 12898, federal actions must address environmental justice (EJ) in minority and low-income populations. Most federal agencies have made EJ part of their mission by identifying and addressing disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority and low-income populations. The Final EIS provides information relating to characteristics of potentially impacted populations for both alternatives (Urban and Rural). The EPA supports the Rural Alternative due to fewer potential impacts to low-income and minority households.

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, was issued to direct federal agencies to minimize environmental health and safety risks to children, and to prioritize the identification and assessment of environmental health and safety risks that may have a disproportionate impact on children. The EPA notes that the FEIS does not specifically include a section on children's health; however, it does identify populations under the age of 18 in the City of Starke, Bradford County, and the State of Florida. It also includes sensitive receptors such as schools and hospitals along both alternatives and provides some discussion on children's health and safety issues associated with crossing the existing U.S. 301 in the City of Starke, as well as the type of sites, including schools, which may be affected by construction and operational noise. Based upon EPA's review of the FEIS, the Rural Alternative appears to have fewer potential impacts to children's health. The EPA recommends that future NEPA documents identify the population of children living along each of the proposed alternatives and other sensitive receptors such as preschools, childcare centers, and schools. The documents should include a cohesive discussion of the potential project impacts, including air quality and noise, in relationship to children's health and safety. The following web link (<http://yosemite.epa.gov/ochp/ochpweb.nsf/content/regs.htm>) provides more information on children's health.

Pursuant to its authority under the Clean Water Act, the EPA requests to be part of the further development of mitigation plans for this project. In addition, the EPA requests to receive a copy of the final Record of Decision for this project.

We appreciate the opportunity to review the proposed action. Please contact Madolyn Dominy at (404)562-9644 if you want to discuss our comments.

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Environmental Accountability

cc: Federal Highway Administration – Florida Division  
U.S. Army Corps of Engineers – Jacksonville District  
U.S. Fish and Wildlife Service – Jacksonville Office  
National Marine Fisheries Service – Southeast Regional Office  
Florida Department of Environmental Protection  
Florida Fish and Wildlife Conservation Commission